

Before the  
UNITED STATES COPYRIGHT ROYALTY BOARD  
Washington, D.C.

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In the Matter of:	)	
	)	
DETERMINATION OF RATES	)	Docket No. 21-CRB-0001-PR
AND TERMS FOR MAKING AND	)	(2023-2027)
DISTRIBUTING PHONORECORDS	)	
(Phonorecords IV)	)	
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**DECLARATION OF ANA NIKOLIC PAUL**

**(On behalf of Amazon.com Services LLC)**

1. I am an associate at Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., counsel for Amazon in the above-captioned proceeding.

2. I respectfully submit this declaration and certification pursuant to the terms of the Amended Protective Order dated November 4, 2021 (“Protective Order”). I am authorized by Amazon to submit this Declaration on Amazon’s behalf.

3. I am familiar with the Copyright Owners’ and Amazon’s Joint Submission Regarding Redaction of April 20, 2022 Order on Amazon’s Motion to Compel Documents Concerning the [REDACTED] from Copyright Owners, including the accompanying Exhibit (collectively, “Joint Submission”).

4. I have reviewed the definitions and terms provided in the Protective Order. After consultation with my client, I have determined to the best of my knowledge, information and belief that the Joint Submission contains information that Amazon has designated as “confidential information” as defined by the Protective Order (“Amazon Protected Material”).

5. Such Amazon Protected Material includes, but is not limited to, highly confidential internal business information that is proprietary, not available to the public, and commercially sensitive.

6. If this highly confidential internal business information were to become public, it would place Amazon at a commercial and competitive disadvantage, unfairly advantage other parties to the detriment of Amazon, and jeopardize its business interests.

7. In addition to the Amazon Protected Material, Amazon is bound under the Protective Order to treat as “Restricted” information designated “Confidential Information” by other participants in the proceedings. The Joint Submission contains information that the Copyright Owners have designated as “Confidential Information.” Amazon is treating that information as “Restricted” and redacting such information in accordance with the terms of the Protective Order. Amazon reserves all rights and arguments as to whether such information is, in fact, “Confidential Information.”

Pursuant to 28 U.S.C. § 1746, I hereby declare under the penalty of perjury that, to the best of my knowledge, information and belief, the foregoing is true and correct.

Dated: April 29, 2022  
Washington, D.C.




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Ana Nikolic Paul  
DC Bar No. 1531904  
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*Counsel for Amazon.com Services LLC*

# Proof of Delivery

I hereby certify that on Friday, April 29, 2022, I provided a true and correct copy of the Declaration of Ana Nikolic Paul Regarding Restricted Materials (PUBLIC) to the following:

Copyright Owners, represented by Benjamin K Semel, served via E-Service at  
Bsemel@pryorcashman.com

Apple Inc., represented by Mary C Mazzello, served via E-Service at  
mary.mazzello@kirkland.com

Joint Record Company Participants, represented by Susan Chertkof, served via E-Service  
at susan.chertkof@riaa.com

Pandora Media, LLC, represented by Benjamin E. Marks, served via E-Service at  
benjamin.marks@weil.com

Google LLC, represented by Gary R Greenstein, served via E-Service at  
ggreenstein@wsgr.com

Warner Music Group Corp., represented by Steven R. Englund, served via E-Service at  
senglund@jenner.com

Johnson, George, represented by George D Johnson, served via E-Service at  
george@georgejohnson.com

Sony Music Entertainment, represented by Steven R. Englund, served via E-Service at  
senglund@jenner.com

Zisk, Brian, represented by Brian Zisk, served via E-Service at brianzisk@gmail.com

UMG Recordings, Inc., represented by Steven R. Englund, served via E-Service at  
senglund@jenner.com

Spotify USA Inc., represented by Joseph Wetzel, served via E-Service at  
joe.wetzel@lw.com

Powell, David, represented by David Powell, served via E-Service at

davidpowell008@yahoo.com

Signed: /s/ Joshua D Branson